Case 3:20-cv-04688-RS Document 567 Filed 07/22/25

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PLEASE TAKE NOTICE that pursuant to Local Rules 6-1 and 6-3, Plaintiff Google LLC. ("Google") respectfully requests that the Court grant its request for an expedited hearing on Google's Motion to Quash the Subpoena of Kent Walker, filed concurrently herewith. This Motion is supported by the Declaration of Naiara Toker filed in support of Google's Motion to Shorten Time for Hearing on Motion to Quash Subpoena dated July 22, 2025 ("Toker Decl.").

I. Introduction

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Google respectfully requests that the Court grant an expedited hearing on Google's Motion before the impending trial of this action. Google will waive filing a reply brief to accommodate an expedited hearing. An expedited hearing on the Motion is necessary to obtain relief from Kent Walker's requested appearance at trial.

II. DISCUSSION

A. Google timely filed this Motion.

Plaintiffs served the subpoena on Kent Walker on July 8, 2025. Toker Decl. ¶ 3. Google timely filed this Motion to Quash the Subpoena, as soon as practically possible. *Id.* ¶ 4.

B. An expedited hearing on the Motion is Necessary to obtain relief before trial.

The Local Rules require that "all motions [] be filed, served, and noticed in writing on the motion calendar of the assigned Judge for hearing not less than 35 days after filing of the motion." Civ. L. R. 7-2(a). Accordingly, with a filing date of July 22, 2025, the earliest date Google's Motion could be heard is August 26, 2025. Given the impending start of the trial on August 18, 2025, should the Court deem it appropriate to hear oral argument on Google's Motion, Google respectfully requests that the hearing be set on an expedited basis, on August 7, 2025, or any other date that is convenient for the Court before the commencement of trial on August 18, 2025. Google will waive filing a reply brief to accommodate an expedited hearing.

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III. CONCLUSION

For the foregoing reasons, Google respectfully requests that the Court grant this Motion for an expedited hearing on Google's Motion to Quash the Subpoena of Kent Walker before the commencement of trial.

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Dated: July 22, 2025

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Respectfully submitted,

COOLEY LLP

By: /s/ Eduardo E. Santacana

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